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BEFORE THE ARIZONA CORPORATION COM

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Chairman

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Commissioner

Arizona Corporation Commission

DOCKETED

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AZ CORP COMMISSION
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IN THE MATTER OF U S WEST
COMMUNICATIONS, INC.'S
COMPLIANCE WITH SECTION 271
OF THE TELECOMMUNICATIONS
ACT OF 1996

DOCKET NO. T-00000B-97-0238

**COVAD COMMUNICATIONS COMPANY OJECTIONS TO QWEST
CORPORATION'S FOURTH SET OF DATA REQUESTS**

Covad Communications Company ("Covad") submits the following objections to Qwest Corporation's ("Qwest") Fourth Set of Data Requests:

GENERAL OBJECTIONS TO ALL DATA REQUESTS

1. Covad objects to each and every Request to the extent they seek information subject to the attorney-client privilege, work product doctrine or any other privilege recognized by the State of Arizona. In responding to these Requests, Covad does not waive, but preserves, all such privileges.
2. Covad objects to each and every Request to the extent they seek information that is confidential, sensitive, competitive in nature or proprietary to it.
3. Covad objects to each and every Request to the extent that they are unreasonably burdensome, overly broad or not reasonably calculated to lead to the discovery of admissible evidence.
4. Covad objects to each and every one of Qwest's definitions and/or instructions to the extent they purport to abrogate any of Covad's rights, or add to any of Covad's obligations under, the Arizona Rules of Civil Procedure or the Commission's Rules.
5. Covad objects to each and every Request to the extent they are overly broad, unduly burdensome and impose any burden not expressly permitted under the

Commission's Rules or the Arizona Rules of Civil Procedure. Specifically, Covad is not required to extract information from documents, recite information contained in documents, or perform work or analysis that Qwest can perform for itself. To the extent that the burden of deriving or ascertaining the response to any Request is substantially the same for Covad and Qwest, Qwest may not shift such burden onto Covad.

6. Covad objects to each and every Request to the extent that they call for information already in the possession, custody and control of Qwest.

7. Covad objects to each and every Request to the extent they seek information outside of Covad's possession, custody or control.

8. Covad expressly reserves the right to supplement or amend its objections and responses as necessary.

Covad incorporates the foregoing General Objections and Reservation of Right into each Request as if fully set forth therein.

Discovery Request No. 1.

Are you providing facilities-based local exchange service to residential customers within Qwest's service territory in the State of Arizona.

Response: No.

Discovery Request No. 2.

Please identify the number of residential access lines you serve via facilities-based competition within Qwest's service territory in the State of Arizona.

Response: See Response to Data Request No. 1.

Discovery Request No. 3.

Please identify the number of business access lines you serve within Qwest's service territory in the State of Arizona via facilities owned by you.

Response: See Response to Data Request No. 1.

Discovery Request No. 4.

Please identify the number of business access lines you serve within Qwest's service territory in the State of Arizona via facilities you lease from a provider other than Qwest.

Response: See Response to Data Request No. 1.

Discovery Request No. 5:

Please identify the number of business access lines you serve via UNE-P within Qwest's service territory in the State of Arizona.

Response: See Response to Data Request No. 1.

Discovery Request No. 6.

Please identify the number of business access lines you serve via UNES and/or UNE Combinations within Qwest's service territory in the State of Arizona.

Response: See Response to Data Request No. 1.

Discovery Request No. 7.

Please identify the number of business access lines you serve via resale within Qwest's service territory in the State of Arizona.

Response: See Response to Data Request No. 1.

Discovery Request No. 8.

Please identify the number of business customers you serve via facilities-based competition within Qwest's service territory in the State of Arizona.

Response: See Response to Data Request No. 1.

Discovery Request No. 9.

Please identify the number of business customers you serve within Qwest's service territory in the State of Arizona via facilities owned by you.

Response: See Response to Data Request No. 1.

Discovery Request No. 10.

Please identify the number of business customers you serve within Qwest's service territory in the State of Arizona via facilities you lease from a provider other than Qwest.

Response: See Response to Data Request No. 1.

Discovery Request No. 11.

Please identify the number of business customers you serve via UNE-P within Qwest's service territory in the State of Arizona.

Response: See Response to Data Request No. 1.

Discovery Request No. 12.

Please identify the number of business customers you serve via UNEs and/or UNE Combinations within Qwest's service territory in the State of Arizona.

Response: See Response to Data Request No. 1.

Discovery Request No. 13.

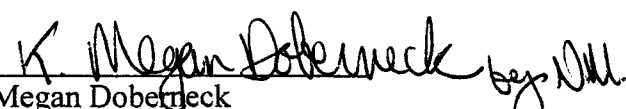
Please identify the number of business customers you serve via resale within Qwest's service territory in the State of Arizona.

Response: See Response to Data Request No. 1.

Dated this 22nd day of June, 2001.

COVAD COMMUNICATIONS COMPANY

By:


K. Megan Doberneck

Senior Counsel

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CERTIFICATE OF SERVICE

I, Nancy Mirabella, hereby certify that an original and ten (10) copies of the Covad Communications Company's Objections to Qwest Corporation's Second Set of Data Requests, in Docket No. T-00000A-97-0238, were sent for filing via overnight delivery on this 22nd day of June, 2001, to the following:

Arizona Corporation Commission
Docket Control-Utilities Division
1200 West Washington Street
Phoenix, AZ 85007-2996

and a true and correct copy of the foregoing was served via overnight delivery this 22nd day of June, 2001, on the following:

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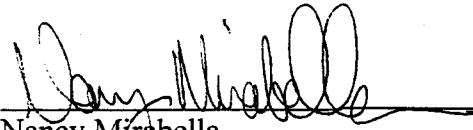
and a true and correct copy of the foregoing was sent via United States Mail, postage prepaid, on this 22nd day of June, 2001, to the following:

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and a true and correct copy of the foregoing document was served electronically on June 22, 2001, to each person on the e-mail distribution list for this docket provided by Staff of the Arizona Corporation Commission.


Nancy Mirabella